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Attorneys for Plaintiff

## IN THE UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	) No. 3:20-cr-00096-JMK-DMS	
Plaintiff, vs.	) COUNT 1: ) POSSESSION OF A CONTROLLED ) SUBSTANCE WITH INTENT TO	
TAJEAN SHAVIEAIR GRANT- MCKAY,	<ul> <li>DISTRIBUTE</li> <li>Vio. of 21 U.S.C. § 841(a)(1) and</li> <li>(b)(1)(C)</li> </ul>	
Defendant.	) COUNT 2: ) POSSESSION OF A FIREARM IN ) FURTHERANCE OF A DRUG ) TRAFFICKING CRIME ) Vio. of 18 U.S.C. § 924(c)(1)(B)(i) )	
	<ul> <li>COUNT 3:</li> <li>FELON IN POSSESSION OF</li> <li>FIREARMS</li> <li>Vio. of 18 U.S.C. §§ 922(g)(1) and</li> <li>924(a)(2)</li> <li>)</li> </ul>	

) <u>CRIMINAL FORFEITURE</u> ) <u>ALLEGATION 1</u> : ) 21 U.S.C. § 853
) <u>CRIMINAL FORFEITURE</u> ) <u>ALLEGATION 2</u> : ) 18 U.S.C. § 924(d) and 28 U.S.C. ) § 2461(c) )

## INDICTMENT

The Grand Jury charges that:

#### COUNT 1

On or about September 27, 2020, within the District of Alaska, defendant TAJEAN GRANT-MCKAY, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

#### COUNT 2

On or about September 27, 2020, within the District of Alaska, defendant TAJEAN GRANT-MCKAY, did knowingly carry firearms, to wit: a Century Arms model C39 7.62x39mm-caliber pistol, a short-barreled Ruger model 10-22 .22-caliber rifle, and a Smith & Wesson model 411 .40-caliber pistol, during and in relation to the drug trafficking offense alleged in Count 1, and did possess those firearms in furtherance of the same drug trafficking crime.

All of which is in violation of 18 U.S.C. § 924(c)(1)(B)(i).

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## COUNT 3

On or about September 27, 2020, within the District of Alaska, defendant TAJEAN GRANT-MCKAY, knowingly having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, firearms, to wit:

- a. One Century Arms model C39 7.62x39mm-caliber pistol;
- b. One Ruger model 10-22 .22-caliber rifle; and
- c. One Smith & Wesson model 411 .40-caliber pistol.

### Convictions

Conviction Date	<u>Offense</u>	<u>Court</u>	Case No.
April 10, 2014	Second Degree Robbery	Superior Court for the State of Alaska at Anchorage	3AN-11- 03362CR

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

## CRIMINAL FORFEITURE ALLEGATION 1

Upon conviction of the offense alleged in Count 1 of this Indictment, defendant TAJEAN GRANT-MCKAY shall forfeit to the United States pursuant to 21 U.S.C. § 853(a)(1) any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

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- 1. One Century Arms model C39 7.62x39mm-caliber pistol, serial number 39WM-002997;
- 2. One Ruger model 10-22 .22-caliber rifle, serial number 820-30287;
- 3. One Smith & Wesson model 411 .40-caliber pistol, serial number TZW0892; and
- 4. \$3,380 in US currency.

All pursuant to 21 U.S.C. § 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

## CRIMINAL FORFEITURE ALLEGATION 2

Upon conviction of Counts 2 or 3 of this Indictment, defendant TAJEAN GRANT-MCKAY shall forfeit to the United States pursuant to 18 U.S.C. § 924 and 28 U.S.C. § 2461(c), any firearms or ammunition involved in the commission of the offense, including, but not limited to:

- 1. One Century Arms model C39 7.62x39mm-caliber pistol, serial number 39WM-002997;
- 2. One Ruger model 10-22 .22-caliber rifle, serial number 820-30287;
- 3. One Smith & Wesson model 411 .40-caliber pistol, serial number TZW0892; and
- 4. Any related magazines and ammunition.

// // // All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Federal Rule of Criminal Procedure 32.2.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Jennifer Ivers
JENNIFER IVERS
Assistant U.S. Attorney
United States of America

s/ Bryan Schroder
BRYAN SCHRODER
United States Attorney
United States of America

DATE: October 22, 2020